

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)
)
)
v.) Criminal No. 12-107
)
EARL D. WARNER)
)

GOVERNMENT'S PROPOSED VOIR DIRE QUESTIONS

AND NOW comes the United States of America, by its attorneys, David J. Hickton, United States Attorney for the Western District of Pennsylvania, and Carolyn J. Bloch, Assistant United States Attorney for said District, and, in addition to standard questions to be asked of potential jurors pursuant to Local Rule 24.2, submits the following additional voir dire questions:

1. This case is being prosecuted by the federal government. Have you or any family member, close friend, or co-worker ever had any difficult or unpleasant experiences with the federal government, including the Internal Revenue Service, Federal Bureau of Investigation, United States Postal Inspection Service, the United States Attorney's Office, or the United States Department of Justice, or do you otherwise have very strong personal feelings against the federal government for whatever reason?

If so (at bench or in camera):

(a) What was the nature of the experience and when did it occur?

(b) What is the nature of your personal feelings against the federal government?

2. Potential witnesses in this case are employed by the Pennsylvania State Police. Have you ever had difficult or unpleasant experiences with state or local police officers or departments in any region, or do you otherwise have very strong personal feelings against any state or local police officer or department for whatever reason?

If so (at bench or in camera):

(a) What was the nature of the experience and when did it occur?

(b) What is the nature of your personal feelings against this police department?

3. Is there anything about your experience with any aspect of the criminal justice system which makes you feel that you could not be a fair and impartial juror in this case and/or would cause you difficulties if you were to serve as a juror in this case?

4. This case involves charges of production and possession of material depicting the sexual exploitation of minors. Is there anything about the nature of this case, or the evidence which may be presented, that would prevent you from

rendering a verdict based solely on the facts and law as provided to you?

5. Have you, a family member, or close personal friend ever been accused of sexual abuse, sexual assault, or sexual harassment, or distribution or possession of child pornography?

6. Do you have strong beliefs or personal experiences regarding consensual sex between a minor and an adult that would influence your ability to fairly and impartially consider the facts and evidence?

7. Do you have beliefs about privacy or free speech that would make it difficult for you to convict a person for possessing material that depicts minors engaged in sexually explicit conduct?

8. Do you have views related to computers, the Internet, or technology generally, that would make it difficult for you to fairly consider forensic evidence or testimony?

9. Have any of you ever served on a grand jury, on a criminal jury in a trial before a judge, and/or been called as a witness at a trial?

If so, is there anything about that experience with the criminal justice system, such as the conduct of the judge, prosecutor, and/or defense counsel, which makes you feel that you could not be a fair and impartial juror in this case and/or

would cause you difficulties if you were to serve as a juror in this case?

10. Do you have any physical condition such as poor hearing, or other personal matters now affecting you, that would interfere with service on a jury?

Respectfully submitted,

DAVID J. HICKTON
United States Attorney

/s/Carolyn J. Bloch
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